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March 25, 2024

Via ECF

Hon. Jennifer L. Rochon
United States District Judge
Southern District of New York
500 Pearl Street, Room 1920
New York, NY 10007

Re: *Daniel Carille v. National Passenger Railroad Corporation (AMTRAK)*
Index No.: 22-cv-10952 (JLR)

Dear Judge Rochon:

We represent Defendant National Railroad Passenger Corporation (“Amtrak”) in the above-referenced matter. We write jointly with Plaintiff’s counsel pursuant to Your Honor’s March 15, 2024 Order directing the parties to meet and confer by March 22, 2024 and jointly submit a letter advising the Court of the progress of discovery by March 25, 2024.

The parties engaged in a telephonic meet and confer on Thursday, March 21, 2024. The parties agreed that Plaintiff will provide corrected authorizations no later than April 5, 2024. In order to allow Defendant sufficient time to process these authorizations and obtain and review the records for same, the parties further agreed that Plaintiff’s deposition will be conducted on or before May 24, 2024. As Plaintiff has noticed the depositions of four (4) individuals in connection with this matter, the parties agreed that Defendant’s depositions will be conducted on or before June 24, 2024. The parties agreed that the proposed timeline will provide sufficient time for Amtrak to conduct Plaintiff’s deposition, prepare the four witnesses that Plaintiff has noticed for depositions, and complete those depositions.

Accordingly, the parties propose the following discovery schedule:

	Originally Scheduled Date	Proposed Date
Completion of Depositions	3/14/24	6/24/24
Completion of Fact Discovery	4/1/24	7/15/24

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Plaintiff's Expert Disclosures	4/15/24	7/29/24
Defendant's Expert Disclosures	4/29/24	8/12/24
Completion of Expert Discovery	5/16/24	8/26/24
Completion of ALL discovery	5/16/24	8/26/24

In addition, we respectfully request a commensurate adjournment of the June 13, 2024 post-discovery pre-trial conference to a date following the completion of all discovery (i.e., September 5, September 12, or September 19, 2024), or to such date as may be convenient for the Court.

Thank you for your consideration of this request.

Respectfully submitted,

/s/ *Matthew P. Moccia*


Matthew P. Moccia

cc: James M. Duckworth
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The Court is pleased that the parties have met and conferred and that discovery is back on track. However, the new proposed schedule is longer than the previously proposed schedule. Given the Court's already expressed concern about the length of discovery, the Court will adopt the following schedule. Depositions shall be complete by **June 24, 2024**. Fact discovery shall close by **July 1, 2024**. Plaintiff's expert disclosures are due by **July 15, 2024**. Defendant's expert disclosures are due by **July 26, 2024**. All discovery -- including expert discovery -- shall close by **August 14, 2024**. The Court shall hold a post-discovery pre-trial conference on **September 17, 2024 at 3:00 p.m.** in Courtroom 20B of the Daniel Patrick Moynihan Courthouse, 500 Pearl Street, New York, NY 10007.

Dated: March 25, 2024
 New York, New York

SO ORDERED.


JENNIFER L. ROCHON
 United States District Judge